# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FTX TRADING LTD., et al., <sup>1</sup>	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)

THIRD SUPPLEMENTAL DECLARATION OF EDGAR W. MOSLEY II IN SUPPORT OF DEBTORS' APPLICATION TO EMPLOY AND RETAIN ALVAREZ & MARSAL NORTH AMERICA, LLC AS FINANCIAL ADVISORS TO THE DEBTORS AND DEBTORS IN POSSESSION PURSUANT TO SECTIONS 327(A) AND 328

OF THE BANKRUPTCY CODE NUNC PRO TUNC TO THE PETITION DATE

Edgar W. Mosley II, being duly sworn, hereby states as follows:

I am a Managing Director with Alvarez & Marsal North America, LLC (together with employees of its affiliates (all of which are wholly-owned by its parent company and employees), its wholly owned subsidiaries, and independent contractors, "A&M"), a restructuring advisory services firm with numerous offices throughout the country. I submit this declaration (this "Third Supplemental Declaration") to supplement my prior declarations that have been submitted in connection with A&M's retention in these chapter 11 cases. Except as otherwise noted, I have personal knowledge of the matters set forth herein.

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

<sup>&</sup>lt;sup>2</sup> Certain of the disclosures herein relate to matters within the personal knowledge of other professionals at A&M and are based on information provided by them.

- 2. On November 11, 2022 and November 14, 2022 (as applicable, the "Petition Date"),<sup>3</sup> FTX Trading Ltd. and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors") commenced these cases by filing voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the "Court").
- 3. On December 21, 2022, the Debtors filed their Application for an Order Authorizing the Retention and Employment of Alvarez & Marsal North America, LLC as Financial Advisors to the Debtors and Debtors in Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code Nunc Pro Tunc to the Petition Date (the "Application") and attached thereto was my declaration of support of the Application (the "Original Declaration").
- 4. On January 19, 2023, the Court entered the Order Authorizing the Retention and Employment of Alvarez & Marsal North America, LLC as Financial Advisors to the Debtors and Debtors in Possession Pursuant to Sections 327(a) and 328 of the Bankruptcy Code Nunc Pro Tunc to the Petition Date.
- 5. On January 19, 2023, and June 23, 2023, the Debtors filed supplemental declarations in support of the Application (together with the Original Declaration, the "Prior Declarations").
- 6. I submit this Third Supplemental Declaration to disclose certain additional information which has come to my attention since the filing of the Prior Declarations. Capitalized terms used herein and not otherwise defined have the respective meanings set forth in the Prior Declarations.

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<sup>&</sup>lt;sup>3</sup> November 11, 2022 is the Petition Date for all Debtors, except for Debtor West Realm Shires Inc.

### **ADDITIONAL POTENTIAL PARTIES IN INTERST**

- 7. In connection with its proposed retention by the Debtors in these cases, A&M has undertaken an ongoing analysis to determine whether any material relevant facts or relationships have arisen or discovered. In connection therewith, it has come to A&M's attention that the entities identified on Schedule A hereto ("New Parties") are parties involved in the Debtor's chapter 11 cases who were not identified on Schedule A to the Prior Declarations. The New Parties together with the parties identified on Schedule A to the Prior Declarations are hereinafter referred to as the "Potential Parties in Interest".
- 8. In addition, I note that A&M has made certain personnel available to provide financial advisory services to WeWork Inc. and its affiliated debtors and debtors in possession ("WeWork") in connection with their chapter 11 cases. WeWork provided office space to the Debtors and are an unsecured creditor with claims of approximately \$87,000 in the Debtors' chapter 11 cases. A&M's services for WeWork do not include pursing claims against the Debtors and A&M will recuse itself in both matters from any litigation or dispute that may arise between WeWork and the Debtors.
- 9. Based on the Firm Procedures described in the Original Declaration, the relationships with the New Parties are identified on Schedule B hereto. In addition, Schedule B contains updated disclosures of connections to certain categories of Potential Parties in Interest.
- 10. Based on the results of its review, to be best of my knowledge, except as set forth herein or in the Prior Declarations, A&M does not have an active relationship with any of Potential Parties in Interest in matters relating to the Debtor's chapter 11 cases.
- 11. To the extent any information disclosed herein requires amendment or modification upon A&M's completion of further review or as additional party-in-interest information

becomes available to it, a further supplemental declaration reflecting such amended or modified information will be submitted to the Court.

[Remainder of page intentionally left blank]

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct.

Dated this 28th day of December, 2023

By: /s/ Edgar W. Mosley II
Edgar W. Mosley II
Managing Director

# Schedule A

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#### FTX Trading Ltd. - Redacted Parties in Interest

363 Sales PartiesName on FileName on FileBFCP IV LLC

Name on File Boba Foundation (fka OMG Foundation)

Name on File

Camp, Stanton

Investments/Acquisitions Camp, Stanto
FIFTH DIMENSION PTE LTD Canoy, Dario

Immutable Pty Ltd Cellco Partnership d/b/a Verizon Wireless

SNIPER LABS INC.

AD HOC COMMITTEE (Non US Customers of FTX.com)

Name on File

Name on File

FC Cayman A, L.L.C. Checkout APAC Pte. Ltd.

GSR Markets Limited / GSR International Trading Chen, Tianyun

Limited Name on File
Kbit Global Limited Name on File
Nickel Digital Asset Management Name on File

Rothschild & Company Inc.

Svalbard Holdings Limited

Name on File
Name on File

Banks/Lender/UCC Lien Parties/Administrative
Agents

Name on File

AgentsName on FileCitizens BankName on FileKEB Hana BankName on FileOpen Pay'dName on File

Schwyzer Kantonalbank Mietzinsdepot

Name on File

**Claimants** Name on File Name on File

Name on File Fondation Serendipity

Arceau 507 LLC Name on File

Name on File

Artz Fund Investments PTE Ltd.

Genesis Asia Pacific Pte. Ltd.

Genesis Global Holdco, LLC

Gensler Costa Rica SRL

Name on File

Austin, Katherine Reed

Bahamas Environmental Group Ltd

Name on File

Name on File

Beckstead, Nicholas

APES GALAGO LP I

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#### FTX Trading Ltd. – Redacted Parties in Interest

Name on File McGee, Michael Green Healthy House, LLC. Meents, David Name on File IPV FTX Co-Invest, a series of Iron Pine Ventures Co-Name on File Invest Fund LLC Name on File Millar, Tim Name on File JK Advisory Pty Ltd Name on File Name on File Name on File

Johnson, Brent Neil Patel Digital, LLC

Name on File Ngoy, Lena Name on File Name on File Kephas Corporation dba DAAG Technology Services Name on File Name on File Name on File Korell, Bailey J. Name on File Lawler, Tana Oroboros FTX I, LLC Leslie, Latoya N Name on File Liquid Value GP Limited Name on File Lötscher, Marcel Name on File

Name on File Rheingans-Yoo, Ross
Name on File Rightsize Facility Performance of Illinois, LLC

Name on File

Rational PR, LLC

Lyon, Matthew
Name on File
Name on File
Mann, Brandon
Name on File
Name on File
Rosenfield, Ian
Name on File
MarketVector Indexes GmbH
Name on File

Lovero, Justin

Name on File

Markou, Joshua Saugstad, Monique Mashinsky, Alex Name on File

Name on File Scott, George Shamond
Name on File Serendipity Network Ltd.

Name on File Name on File

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#### FTX Trading Ltd. – Redacted Parties in Interest

Name on File

Name on File

Shindledecker, Craig

Name on File

Simpson Thacher & Bartlett LLP

Slate, Joshua Name on File Name on File

Name on File

Name on File

Sun, Cheuk Ying (Josephine)

Name on File

Name on File

Name on File

Name on File

Tennessee Department of Revenue Theatre Projects Consultants, Inc.

Name on File

Name on File

Name on File

Name on File Name on File

Name on File

Two Sigma Ventures III

Name on File

Wever, Dena

Name on File

Name on File

Wu, Qianwen

Name on File

Name on File

Young, Christopher

Zhang, Chang An

Zhang, Zirui

Name on File

**Contract Counter-Parties** 

Access Labs Inc

Aerotitle

AIC Title Agency, LLC

Frank Schuler & Birgit Kupka

**Howard Andrew Fisher** 

MJMcCaffrey Holdings, LLC

Mr. Seun Gun Lee

**ODUNOLUWA LONGE** 

Paul Veradittakit

**Tether International Limited** 

Tom Lee

**OTHER SIGNIFICANT CREDITORS** 

Alice Zhou

Chan Kam Yee (Josephine)

Ho Tak Ming (Aslan)

Kwan Chan

Rawson, Ryan Michael Leigh

Vincent Tsun Ho Kwok

Wendy Laraine Lee

Wun Siu Ming

**Yiling Chen** 

Director/Officer

Bankman, Joseph

**Eric Schwartz** 

Panagiotis Papachristoforou

TERENCE J. CULVER

Watanabe, Claire

**Donations** 

ALABAMA CONSERVATIVES FUND

Association for Long Term Existence and Resilience

Center for Disease Dynamics, Economics and Policy

Center For Emerging Risk Research

Clinton Health Access Initiative, Inc

FLORIDA INTERNATIONAL UNIVERSITY

GMI Pac, Inc.

LIBERTY CHAMPIONS

Machine Intelligence Research Ins

**Rethink Charity** 

SENATE LEADERSHIP FUND

World Trade Center Performing Arts Center, Inc.

Litigation

Coinhub Group Inc

Dalian Tianfang Enterprise Management Co., Ltd.

Fastrax S.A.

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#### FTX Trading Ltd. – Redacted Parties in Interest

Fengzhen Wang Ferreyros S.A. Fueltech Ltda

Horiba, Ltd. Jack in the Box

Harun Ozan

Kent Uyehara Nguyen Huu Tai

Power Rich International Development Limited Shenzhen Galaxy Real Estate Development Co., Ltd.

The Financial Times Limited

Turkiye Finans Katilim Bankasi A.S.

**Ordinary Course Professionals** 

Abrams & Bayliss LLP

Advokatur Sprenger+Partner

Alpha 8 Tax Solutions Arias, Fábrega & Fábrega Axalo Treuhand AG

**Bowmans** 

CDB Legal Services Cinder Creek LLC Farahat & Co.

FCG Fair Consulting Group

Grant Thornton Groom Law Group Hamel-Smith Caribbean

Harris Kyriakides

Kantenwein Zimmermann Spatscheck & Partner

**KPMG** 

Ladas & Parry LLP

Lane IP

Lincoln Park Advisors LLC

Link Partners MKY Group AG Niro LLC

North Country Capital LLC

**S&N Partners** 

SEK Steuerberatungsgesellschaft

**Tricor Services Limited** 

Taxing Authority/Governmental/Regulatory

Agencies

**Dubai Multi Commodities Centre** 

Hk Inland Revenue Dept

New York State Department of Taxation and

Finance

**US Department of Treasury** 

**UCC Professionals** 

**Epiq Corporate Restructuring** 

Vendors

A - Star Consulting Llc

A&G Beteiligungsgesellschaft Mbh Ace Digital Innovations Co. Ltd

AIA SG Pte Ltd.

Al-muzaini Exchange Co, K.s.c.c

Astteria (Hk) Limited Astteria (Hk) Limited

Asymmetric Labs Inc. Blue Reservoir Pte Ltd

**BOST** 

C W Publishing

C2 Capital Management, Llc CAPITAL MANAGEMENT AG

**CBD** 

Central Provident Fund (Singapore) Chicago Title Insurance Company

CHINA ZHESHANG CO LTD Crowe Horwath First Trust LLP

Data.Al
DAVID CHIU

DCG International Investments Ltd.

Decheque Inc.

Digital Assets Council of Financial Professionals, LLC

Digital Entertainment Asset Pte. Ltd DUBAI WORLD TRADE CENTRE LLC

**E-BENE CONSULTING** 

Easy Collect and International Payment Service

(credit card

Far Horizon Capital Inc

Farhat Office

Fastlane Consulting Ltd Grey Elephant Solutions Llc

Hashwatt, Inc
High 5, Llc
Into the Block
Joseph Learner
Kirsch Capital Equity
KRA Overseas Ltd.

Layer3 Xyz, Inc

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#### FTX Trading Ltd. – Redacted Parties in Interest

Light Year Capital Gmbh

Mercedes F-1

Merril Lynch

Milo Credit, Llc

MPEG Live

Ocean Digital 401K

Offpiste Io Inc

OpenFortue

Osum, Inc

Pattern Engine, Inc

Payblr, Inc.

Pdyf (Bvi ) Feeder Ltd.

Philip lannaccone

Phobos Crypto Fund, Lp

PIT

Ready Campaign Inc.

Rocketfuel Blockchain, Inc

Silveridge Pte Ltd

Singapore Business Federation

Singapore Pte Ltd

Solana Labs, Inc

Spilsbury Holdings Limited

Steel Perlot Management, LLC

Tathastu Labs DMCC

Td Ameritrade Clearing, Inc.

**Tether International Limited** 

TSB

Vcam

Vector Space Biosciences, Inc

Wachsman

Warriors

Washington Wizards

Webflow Inc.

Schedule B

#### **FTX Trading**

# Current and Former Clients of A&M and/or its Affiliates <sup>1</sup>

**CBD** 

Chicago Title Insurance Company

Citizens Bank

DCG International Investments Ltd.

**Epiq Corporate Restructuring** 

Name on File

Financial Times Limited, The

**Grant Thornton** 

Jack in the Box

**KPMG** 

Light Year Capital Gmbh

Merrill Lynch

Rothschild & Company Inc.

TD Ameritrade Clearing, Inc.

**TSB** 

World Trade Center Performing Arts Center, Inc.

# **Significant Equity Holders of Current** and Former A&M Clients<sup>2</sup>

AIC Title Agency, LLC
Cellco Partnership d/b/a Verizon Wireless
Chicago Title Insurance Company
Light Year Capital Gmbh
Mashinsky, Alex
Merrill Lynch
Rothschild & Company Inc.
Tether International Limited
Two Sigma Ventures III
US Department of Treasury

# Professionals & Advisors<sup>3</sup>

A&G Beteiligungsgesellschaft Mbh Arias, Fabrega & Fabrega Chicago Title Insurance Company Crowe Horwath First Trust LLP Epiq Corporate Restructuring Grant Thornton Groom Law Group KPMG Rothschild & Company Inc.

# Government and Regulatory<sup>4</sup>

Dubai Multi Commodities Centre
New York State Department of Taxation and
Finance
Tennessee Department of Revenue
US Department of Treasury

# A&M Vendors<sup>5</sup>

Cellco Partnership d/b/a Verizon Wireless
Crowe Horwath First Trust LLP
Financial Times Limited, The
Grant Thornton
Hamel-Smith Caribbean
KPMG
Merrill Lynch
Rightsize Facility Performance of Illinois,
LLC
TSB

<sup>&</sup>lt;sup>1</sup> A&M and/ or an affiliate is currently providing or has previously provided certain consulting or interim management services to these parties or their affiliates (or, with respect to those parties that are investment funds or trusts, to their portfolio or asset managers or their affiliates) in wholly unrelated matters.

<sup>&</sup>lt;sup>2</sup> These parties or their affiliates (or, with respect to those parties that are investment funds or trusts, their portfolio or asset managers or other funds or trusts managed by such managers) are significant equity holders of clients or former clients of A&M or its affiliates in wholly unrelated matters.

<sup>&</sup>lt;sup>3</sup> These professionals have represented clients in matters where A&M was also an advisor (or provided interim management services) to the same client. In certain cases, these professionals may have engaged A&M on behalf of such client.

<sup>&</sup>lt;sup>4</sup> A&M and/or an affiliate is currently providing or has provided certain consulting or interim management services to these government entities or regulatory agencies in wholly unrelated matters.

<sup>&</sup>lt;sup>5</sup> These parties or their affiliates provide or have provided products, goods and/or services (including but not limited to legal representation) to A&M and/or its affiliates

## **FTX Trading**

 $\frac{Individual\ Parties\ w/Indeterminate\ A\&M}{Connections} \underline{^6}$ 

Learner, Joe

<sup>6</sup> A&M used reasonable efforts to determine whether the large number of individual Potential Parties in Interest in these chapter 11 cases are related to individual parties who appeared in A&M's Client Database; however, A&M may have been unable to identify with specificity certain connections based on the generality of such individuals' names and/or the

information available to A&M at this time. To the extent A&M's connections to such individual parties were unable to be confirmed, A&M has separately identified these parties on this Schedule as "Indeterminate".